

ZEIGER, TIGGES & LITTLE LLP

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December 27, 2021

VIA EMAIL

Robert J. Hantman, Esq.
Hantman & Associates
1120 6th Avenue
New York, NY, 10036

Re: Jennifer Araoz

Dear Mr. Hantman:

Our Firm is counsel to Leslie H. Wexner.

On December 14, 2021, our Firm received an unsolicited email from Jennifer Araoz. In her email, Ms. Araoz expresses her hope that we would work with you, as her counsel, to reach “a fair and reasonable resolution...out of the public spotlight and without further public filings, court intervention and potential trial.” (Emphasis added.) A copy is enclosed. Please advise Ms. Araoz that we cannot ethically respond to her email inasmuch as she is represented by legal counsel. We request that she not directly communicate with our Firm again.

Ms. Araoz's email came on the heels of attempted service of a Notice to Mr. Wexner, the Wexner Foundation and other Wexner related defendants of a claim apparently filed by Ms. Araoz in Queens County, New York. Her Notice demands a sum of \$10,000,000 based upon alleged “conduct perpetrated against her at the premises owned and/or controlled by defendant Leslie H. Wexner, located at 9 East 71st Street, New York, NY 10021, from 2001-2002, when plaintiff was under the age of 18”

While our clients empathize with Ms. Araoz for any harm done to her, let us be clear: Ms. Araoz's allegations against Mr. Wexner and the Wexner related entities are false. As has been widely reported, Mr. Wexner sold his entire interest in the subject property for \$20 million in 1998, several years before the relevant time period during which your client claims she was harmed. [See attached articles]. As such, the named defendants cannot possibly have liability to your client. Moreover, none of the other named defendants ever had any relationship to the subject property. Indeed, as a simple review of public records from the Secretary of State confirms, some of the named defendant entities did not even exist at the time she alleges

EXHIBIT

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ZEIGER, TIGGES & LITTLE LLP

Robert J. Hantman, Esq.
December 27, 2021
Page 2

misconduct. Simply put—there is no good faith basis for Ms. Araoz’s claims against any of the named defendants.

Be clear: our clients reject Ms. Araoz’s coercion attempt. Our clients will not pay her any amount based on her demonstrably false claims and reject her threat to damage them in the “public spotlight” or by “further public filings.”

Ms. Araoz must immediately dismiss her action. If she fails to do so and persists in pursuing her false claim, our clients reserve all of their rights, including recovery of their fees and expenses in seeking its dismissal.

Very truly yours,

Marion H. Little, Jr.

Enclosures

MHL:tlr:1053-001:931914

From: Jennifer Araoz <jenniferaraoz7887@gmail.com>
Sent: Tuesday, December 14, 2021 4:59 PM
To: John W. Zeiger; Marion H. Little
Subject: Matter Involving Your Client

Dear Sirs,

While I am Pro Se (click [here](#) for my Summons with Notice), I recently retained a law firm to assist in reaching a resolution of this matter on my behalf and that of my organization to assist survivors of sexual abuse.

I, like most survivors of sexual abuse, can never really be made whole but I sincerely hope that between your firm and Mr. Hantman a fair and reasonable resolution can be reached, out of the public spotlight and without further public filings, court intervention and potential trial.

If you are in agreement, please contact

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Thank you

Jennifer Araoz